# **Support Economic Innovation**

Implementation Action Area #1: Improve Data and Information Systems

| Action           | Lead           | Specifics                             | Retain/Revise/  |
|------------------|----------------|---------------------------------------|-----------------|
|                  | Implementers   |                                       | Complete/Delete |
| Evaluate the     | State (DCEO,   | The history and impacts of state      | Retain          |
| success of state | and other      | programs and incentives for           |                 |
| innovation       | relevant state | innovation should be evaluated.       |                 |
| programs and     | agencies)      | Such an evaluation can inform the     |                 |
| financial        |                | re-creation of certain programs, like |                 |
| incentives       |                | ITEC and Innovation Challenge         |                 |
|                  |                | grants, which have experienced        |                 |
|                  |                | funding cuts in recent years. The     |                 |
|                  |                | State should also evaluate current    |                 |
|                  |                | programs, like IEN as well as the     |                 |
|                  |                | range of other financial incentives   |                 |
|                  |                | and services offered to               |                 |
|                  |                | entrepreneurs and businesses.         |                 |
|                  |                | There is good evidence that many      |                 |
|                  |                | of these state programs have been     |                 |
|                  |                | quite successful these successes      |                 |
|                  |                | need to be better documented and      |                 |
|                  |                | publicized to inform future state     |                 |
|                  |                | legislation.                          |                 |

#### **Implementation Examples:**

- CMAP is conducting research on the role of state and regional governments in planning for economic development opportunities. This includes best practices in economic development programs from around the country as well as how the region and state' current incentive programs can respond to new global dynamics.
- Additionally, CMAP's <u>Examination of Local Economic Development Incentives in Northeastern Illinois</u> report analyzes the prevalence, structure, and goals of local financial incentives including sales tax rebate, tax increment financing, property tax abatement, and property tax incentive classifications unique to Cook County.
- The Illinois Science and Technology Coalition is investigating state innovation programs focused on the biotech and health sciences cluster.

#### Rationale for Retain/Revise/Complete/Delete Assessment:

• Ongoing assessments are a good step, but there is still a need for a complete evaluation.

| Action                | Lead         | Specifics                                 | Retain/Revise/  |
|-----------------------|--------------|---|-----------------|
|                       | Implementers |   | Complete/Delete |
| Collect data relative | CMAP, WBC,   | Currently there is no solid information   | Retain          |
| to innovative         | InnovateNow, | about how innovations translate into      |                 |
| business starts and   | IDES         | larger economic effects, such as jobs and |                 |
| closures in the       |              | business starts. CMAP should measure      |                 |
| region                |              | the number of new innovation start-up     |                 |
|                       |              | firms and jobs created (a similar         |                 |
|                       |              | measurement was developed by San          |                 |
|                       |              | Diego's CONNECT program). This is         |                 |
|                       |              | the best way to track the growth in new   |                 |
|                       |              | firms, as well as their longevity. This   |                 |
|                       |              | information should also have useful       |                 |
|                       |              | research consequences beyond the study    |                 |
|                       |              | of innovation.                            |                 |

- The <u>Illinois Innovation Index</u> measures start-ups as part of its assessment of the business climate. Data shows the number of startups by industry and how the Chicago region compares to our peer regions.
- Since 2011, Built in Chicago has been measuring the number of digital startups each quarter and compiles the totals in an annual report. The <u>quarterly and annual reports</u> also tract the funding raised by startups, number of jobs at startups, and the number of acquisitions.

# Rationale for Retain/Revise/Complete/Delete Assessment:

• We are tracking this and continuing to do so will allow us to see trends.

| Action         | Lead         | Specifics                             | Retain/Revise/  |
|----------------|--------------|---------------------------------------|-----------------|
|                | Implementers |                                       | Complete/Delete |
| Collect and    | CMAP, WBC,   | CMAP can serve a vital role as a      | Retain          |
| analyze other  | InnovateNow, | central repository for the collection |                 |
| pertinent data | CMRC, IDES,  | of data related to innovation.        |                 |
| related to     | additional   | CMAP should also consider how to      |                 |
| innovation     | outside      | best measure success through this     |                 |
| outcomes       | experts      | data other groups have created        |                 |
|                |              | weighted measures of a variety of     |                 |
|                |              | variables an "innovation index"       |                 |
|                |              | which can work to measure future      |                 |
|                |              | success.                              |                 |

• Since 2011, CMAP has collaborated with World Business Chicago, the Illinois Science and Technology Coalition, and the Chicagoland Chamber of Commerce to create the Illinois Innovation Index. In its first year, the partners released a monthly newsletter examining a different innovation indicator, including exports, small business funding, patents, R&D funding, cluster trends, and several others. The group published an annual report compiling all the indicators in one document. Beginning in 2013, the group has issued shorter monthly updates, and focused on more robust analysis in a quarterly newsletter. Each quarter focuses on a different theme: Capital, Dynamism, Business Climate, and Talent.

#### Rationale for Retain/Revise/Complete/Delete Assessment:

• We are tracking this and continuing to do so will allow us to see trends.

| Action       | Lead          | Specifics                             | Retain/Revise/  |
|--------------|---------------|---------------------------------------|-----------------|
|              | Implementers  |                                       | Complete/Delete |
| Research and | State (DCEO), | There is some evidence that           | Retain          |
| redesign     | technology    | innovators are changing their         |                 |
| technology   | transfer      | products to be responsive to the      |                 |
| transfer     | programs at   | criteria by which technology transfer |                 |
| evaluation   | universities  | programs are judged. This is likely   |                 |
| criteria     | and other     | inefficient. Alternative metrics that |                 |
|              | institutions  | better reward commercialization of    |                 |
|              |               | new innovations should be             |                 |
|              |               | explored. Applied research should     |                 |
|              |               | be carried out by interviewing tech   |                 |
|              |               | transfer officials and researching    |                 |
|              |               | other evaluation metrics.             |                 |

- CMAP published the freight cluster drill-down in 2012 and the manufacturing cluster drill-down in 2013. Together these analyses call attention to commercialization challenges between basic research and marketable products, and provide steps to increase technology transfer through increased private-sector participation in key technology specializations.
- Together with its partners, CMAP tracks technology transfer metrics and news as part of the Illinois Innovation Index. This includes technology licenses and revenue, academic patent output, and university start-ups.
- In its economic development work CMAP has called attention to the region and state's underperformance in the federal SBIR/STTR technology transfer programs, highlighting the need to better engage the region's numerous small-sized firms in commercialization activities. The Illinois Science and Technology Coalition has also undertaken work to improve small firm's technology transfer competitiveness through SBIR and STTR.

#### Rationale for Retain/Revise/Complete/Delete Assessment:

• Criteria have not yet changed but remain an issue.

| Action            | Lead          | Specifics                            | Retain/Revise/  |
|-------------------|---------------|--------------------------------------|-----------------|
|                   | Implementers  |                                      | Complete/Delete |
| Form coalitions   | State (DCEO), | The region should use its various    | Retain          |
| around the        | CMAP, local   | clusters of regional specialization  |                 |
| region's vital    | governments,  | as an overarching organizing         |                 |
| industry clusters | nonprofits    | framework for future coordination,   |                 |
| to organize       | (Chicagoland  | collaboration, and proactive         |                 |
| regional          | Chamber,      | initiatives, including organizing    |                 |
| strategies and    | CMC, MEGA,    | around potential funding             |                 |
| obtain public     | World         | opportunities such as the            |                 |
| and/or private    | Business      | reauthorization of America           |                 |
| funding           | Chicago),     | COMPETES, which should include       |                 |
|                   | Chicago Fed,  | funding for a Regional Innovation    |                 |
|                   | workforce     | Clusters Initiative. Build           |                 |
|                   | boards,       | public/private coalitions to attract |                 |
|                   | philanthropic | funding and involve research labs    |                 |
|                   | organizations | and universities as appropriate.     |                 |
|                   |               | Illinois CleanTech, hosted by the    |                 |
|                   |               | Chicagoland Chamber, is a recent     |                 |
|                   |               | initiative that may be a model for   |                 |
|                   |               | such future activity.                |                 |

- An interstate coalition of universities, private firms, educators, public agencies, and civic
  organizations was established to garner federal support to expand the mega-region's
  innovation assets and grow the nation's second largest manufacturing cluster. In Illinois,
  efforts were coordinated through the Illinois Science and Technology Coalition and
  World Business Chicago; CMAP's Economic Development Committee was engaged in
  this process. In 2013, the coalition organized a mega-regional application for pending
  federal National Network for Manufacturing Innovation funding to build an innovation
  accelerator.
- Strategies are also underway to support the region's transportation and logistics companies. World Business Chicago's "Plan for Economic Growth and Jobs," prompted the development of several stakeholder-led groups to identify challenges and opportunities among the City and Region's key industries and growth areas. One such group, WBC's Transportation and Logistics Strategy Team, will help develop a strategy to elevate the Chicago region's status the nation's transportation and logistics hub, with goals to increase local business and jobs, and partner with universities and colleges to better target funding and build a workforce tailored to this industry.
- CMAP is involved with two efforts to better coordinate workforce funding and training.
   CMAP's Local Technical Assistance program is assisting the <u>Golden Corridor</u>
   <u>Manufacturing Group</u> to better coordinate industry partners and educators on addressing workforce needs of the I-90 manufacturing corridor. Additionally, CMAP is

engaged with the Chicago Workforce Alliance Industry Partnerships which coordinates the workforce grant making for several area foundations and strategically engages and supports key industries.

# Rationale for Retain/Revise/Complete/Delete Assessment:

• This is happening but there is a need for existing coalitions to be strengthened and there is a need and space for additional coalitions.

| Action               | Lead         | Specifics                           | Retain/Revise/  |
|----------------------|--------------|-------------------------------------|-----------------|
|                      | Implementers |                                     | Complete/Delete |
| Perform a "drill     | CMAP,        | Industry clusters have been         | Retain          |
| down" analysis into  | Chicago Fed, | researched extensively, but many    |                 |
| specific established | regional     | gaps, practical linkages and        |                 |
| industry clusters,   | leaders or   | pertinent policy responses remain   |                 |
| including            | coalitions   | poorly understood. CMAP             |                 |
| freight/logistics,   | around       | should direct research toward       |                 |
| advanced             | industry     | "drilling down" into specific       |                 |
| manufacturing, and   | clusters     | industry clusters and groups of     |                 |
| biotech/biomed, as   |              | interrelated firms in the fields of |                 |
| well as emerging     |              | freight/logistics, energy and       |                 |
| clusters such as     |              | advanced manufacturing, and         |                 |
| green technology     |              | biotech/biomed, for starters.       |                 |
| and energy           |              | Analyses will present data specific |                 |
|                      |              | to these clusters, identify         |                 |
|                      |              | infrastructure, workforce and       |                 |
|                      |              | financing needs, present strategies |                 |
|                      |              | for coordination and                |                 |
|                      |              | communication, and make policy      |                 |
|                      |              | recommendations.                    |                 |

- CMAP published the Freight Cluster Drill-Down in 2012 and the Manufacturing Cluster Drill-Down report in 2013. The reports define the cluster, examine recent trends, and consider the impact major national and international developments have on these clusters regionally. Using both quantitative data and information gathered through qualitative research and interviews, the reports include an analysis of the key challenges and opportunities regarding infrastructure, workforce, and innovation. The reports then describe priority areas and next steps to strengthen these clusters.
- Through late 2012 and early 2013, the Workforce Boards of Metropolitan Chicago in partnership with the Metro Economic Growth Alliance of Chicago (MEGA) have published reports on four industry clusters: Biomedical and Life Sciences; Business, Technical and Financial Services; Manufacturing; and Transportation and Logistics. These reports describe the clusters' key strengths, value chain, occupational opportunities, and market opportunities,

#### Rationale for Retain/Revise/Complete/Delete Assessment:

• CMAP plans on continuing this activity.

# Implementation Action Area #3: Increase the Commercialization of Research, Target Investment Decisions, and Pursue New Financing Opportunities

| Action           | Lead           | Specifics                                 | Retain/Revise/  |
|------------------|----------------|---|-----------------|
|                  | Implementers   |   | Complete/Delete |
| Bolster or       | State (General | State elected officials should bolster or | Revise          |
| reinstitute      | Assembly,      | reinstitute state programs with a track   |                 |
| successful State | DCEO)          | record of success in assisting            |                 |
| programs which   |                | entrepreneurs with critical business      |                 |
| assist           |                | startup and marketing needs, locating     |                 |
| entrepreneurs    |                | pre-seed and early stage financing,       |                 |
| and create       |                | furthering technical or managerial        |                 |
| linkages         |                | skills, and assisting with new product    |                 |
| between          |                | development and marketing. IEN is         |                 |
| researchers and  |                | one current program along these           |                 |
| the private      |                | lines. In addition, the ITEC programs     |                 |
| sector           |                | previously awarded funding that           |                 |
|                  |                | could be used to put together             |                 |
|                  |                | documentation for venture capital or      |                 |
|                  |                | "angel" investors, apply for federal      |                 |
|                  |                | SBIR money, apply for a patent, or        |                 |
|                  |                | put together a business plan. ITEC is     |                 |
|                  |                | currently unfunded by the State.          |                 |

#### **Implementation Examples:**

- The University of Illinois has released plans to open a research laboratory in Chicago that combines private funding with university expertise in key innovation areas. The lab will join basic research with real-world problems, creating a clear linkage between researchers and the private sector. The University of Illinois has also partnered with numerous public and private entities to organize the region around a National Network for Manufacturing Innovation center that would draw on the region's advanced manufacturing cluster.
- In addition to the proposed university labs, the State of Illinois is involved in several other partnerships supporting innovation. One example is the Joint Center for Energy Storage Research, a public-private partnership housed at Argonne National Laboratory focused on advancing battery technology and transferring these breakthroughs into the market through licensing.

#### Rationale for Retain/Revise/Complete/Delete Assessment:

• Consider revising this action to reflect newer models of work done by ITEN and ITEC.

| Action           | Lead           | Specifics                         | Retain/Revise/  |
|------------------|----------------|-----------------------------------|-----------------|
|                  | Implementers   |                                   | Complete/Delete |
| Re-institute the | State (General | Some version of the Innovation    | Retain          |
| Illinois         | Assembly,      | Challenge Matching Grant program  |                 |
| Innovation       | DCEO)          | should be reinstated to provide   |                 |
| Challenge        |                | matching funding for federal SBIR |                 |
| Matching Grant   |                | and STTR recipients. SBIR and     |                 |
| program          |                | STTR are federal programs funding |                 |
|                  |                | small businesses working with     |                 |
|                  |                | universities.                     |                 |

• The <u>Illinois Science and Technology Coalition</u> analyzed the need to incent and attract federal SBIR and STTR dollars to our state's economy. In 2012, Illinois businesses won 121 SBIR and STTR awards, totaling approximately \$41 million dollars, in early stage federal funding for feasibility (Phase I) and prototyping (Phase II) projects. ISTC reports that SBIR Phase I awards of up to \$150,000 make up the majority of awards whereas SBIR Phase II awards, which can be as high as a million dollars, account for over half of the total value of all awards.

### Rationale for Retain/Revise/Complete/Delete Assessment:

• This continues to be a need as it will help increase the amount of federal funds awarded to companies in the state.

| Action          | Lead            | Specifics                            | Retain/Revise/  |
|-----------------|-----------------|--------------------------------------|-----------------|
|                 | Implementers    | -                                    | Complete/Delete |
| Explore the     | State           | A new venture capital fund should    | Revise          |
| creation of a   | (Governor's     | be created to help investors and     |                 |
| major new       | office, DCEO),  | entrepreneurs create and grow        |                 |
| venture         | the business    | profitable businesses in the         |                 |
| capital fund,   | community, the  | metropolitan Chicago region and      |                 |
| at the regional | Federal Reserve | potentially beyond. The fund should  |                 |
| or mega-        | Bank of         | be managed and operated by a         |                 |
| regional level  | Chicago,        | private firm, but exploration should |                 |
|                 | nonprofits, I2A | be done first by government, civic   |                 |
|                 | fund,           | organizations, foundations, and the  |                 |
|                 | philanthropic   | private sector. The fund should be   |                 |
|                 | organizations   | targeted toward clusters of regional |                 |
|                 |                 | specialization. A range of private   |                 |
|                 |                 | and public revenue sources should    |                 |
|                 |                 | contribute to such a fund, and       |                 |
|                 |                 | philanthropic organizations can play |                 |
|                 |                 | a large role.                        |                 |

- In 2012, DCEO launched the Invest Illinois Venture Fund, a new venture capital fund that seeks to support young, innovative companies that show high potential for growth. The fund is part of a larger \$78 million initiative called Advantage Illinois, which includes several funding options for small businesses. The funding came from an initiative within the federal Small Business Jobs Act signed into law in September 2010.
- Also launched in 2012, the FireStarter Fund is a group of Chicago based investors
  focused on supporting the digital technology field. The fund can make investments in
  companies throughout the U.S. but all the investors are based in Chicago so it is
  anticipated the investments will be concentrated in the Chicago area and upper
  Midwest.

#### Rationale for Retain/Revise/Complete/Delete Assessment:

• The new Invest Illinois Venture Fund and FireStarter Fund are not exactly what was recommended, although the state fund is pretty close. It is young so we may want to revise this action to focus on supporting this new tool and tracking its usage.

| Action  | Lead                  | Specifics   | Retain/Revise/  |
|---|-----------------------|---|-----------------|
|   | Implementers          |   | Complete/Delete |
| Create a more robust national innovation policy | Federal<br>(Congress) | Provide more incentives for public/private collaboration around innovation. Provide federal funds that can be leveraged with private resources. Provide competitive funding for regional approaches around specific industry clusters. Many of these types of approaches are being discussed as part of the upcoming reauthorization of America COMPETES, a federal technology, research and education act. | Revise          |

- The Obama administration has launched several initiatives that signal a more robust approach to promoting innovation. Originally launched in 2010, the i6 challenge continues to grow and included a new competition in 2012. The program is funding six new partnerships with a \$1,000,000 grant to establish proof-of-concept centers to support innovators and researchers, expand access to capital, and connect entrepreneurs with the resources they need to grow.
- The Jobs and Innovation Accelerator Challenge brings together several federal agencies to support regional industry clusters. In 2012, the initiative focused on advanced manufacturing and emphasized the importance of public-private partnerships. A proposal from the region was submitted but was not successful. Ten projects were selected and each was awarded approximately \$2,000,000.
- Since the implementation of GO TO 2040, the America COMPETES Act of 2007 was reauthorized. The America COMPETES Act of 2010 is set to expire in 2013.

#### Rationale for Retain/Revise/Complete/Delete Assessment:

 The Obama Administration has created a more robust innovation policy, though more could be done. Revise to reflect recent developments in national policy since GO TO 2040 (e.g., the reference to America COMPETES).

#### Implementation Action Area #4: Create a Culture of Innovation

| Action       | Lead            | Specifics                            | Retain/Revise/  |
|--------------|-----------------|--------------------------------------|-----------------|
|              | Implementers    |                                      | Complete/Delete |
| Research,    | State (DCEO),   | Innovation success stories should be | Retain          |
| compile, and | nonprofits      | collected and publicized.            |                 |
| publicize    | (Chicagoland    | Commonalities of these experiences   |                 |
| examples of  | Chamber, CMC,   | should be emphasized, and the role   |                 |
| successful   | MEGA, World     | of experimentation and perseverance  |                 |
| innovation   | Business        | must be taught so that workers,      |                 |
|              | Chicago)        | entrepreneurs, and sources of        |                 |
|              | philanthropic,  | funding see experimentation as an    |                 |
|              | private sector, | important stepping stone to          |                 |
|              | universities    | innovation and growth.               |                 |

# **Implementation Examples:**

- Each year the Chicago Innovation Awards celebrates innovation in the region by recognizing the most innovative new products and services introduced in metropolitan Chicago. Now in its 12<sup>th</sup> year, the award program provides many benefits—in addition to raising awareness on the innovative companies in the region, winners get access to publicity as well as training and mentoring opportunities.
- Techweek, Inc. holds a Chicago convenes entrepreneurs, researchers, and other innovation leaders through a week-long conference and expo.
- Formed by the Governor to foster innovation in the state, the Illinois Innovation Council promotes the role of innovation in economic growth, convenes academia, business and government, and recommends criteria to measure success.
- CMAP participates in the Illinois Innovation Index, a monthly publication that investigates, compiles, and publicizes innovation metrics and news in the state and region. Each issue includes a "spotlight" highlighting an innovative company or other recent development that demonstrates the region's ability to foster innovation.

#### Rationale for Retain/Revise/Complete/Delete Assessment:

• This is happening, but should happen on an ongoing basis.

| Action                                      | Lead  | Specifics   | Retain/Revise/  |
|---|---|---|-----------------|
|   | Implementers  |   | Complete/Delete |
| Expand and link innovation related training | Nonprofit (Chicagoland Chamber, MEGA, World Business Chicago), universities | There are multiple conferences and educational programs that support innovative thinking in the region. These programs should be expanded to reach wider audiences. Educational programs, conferences, and innovation competitions should also be linked so that budding innovators can interact across fields and disciplines to share experiences and foster further innovative thinking. | Retain          |

- Several organizations focus on supporting entrepreneurs involved in innovation and helping them thrive. Chicago Innovation Mentors provides innovation training to startups. Clean Energy Trust offers business development support in clean energy startup. Built In Chicago also supports conferences and education in digital startup space.
- Based in the Illinois Science and Technology park located in Skokie, the Oakton
  Community College nanotechnology education division has recently launched the
  Nanotechnology Employment, Education, and Economic Development Initiative (NE3I).
  The program will engage local high schools, provide hands on learning experiences, and
  include a certificate program.

#### Rationale for Retain/Revise/Complete/Delete Assessment:

• This action remains a priority for CMAP and the region.

| Action        | Lead          | Specifics                        | Retain/Revise/  |
|---------------|---------------|----------------------------------|-----------------|
|               | Implementers  |                                  | Complete/Delete |
| Reorient      | Philanthropic | The region's foundations are a   | Retain          |
| philanthropic |               | strong asset and to date have    |                 |
| giving toward |               | funded extensive efforts in      |                 |
| innovation    |               | education, arts and culture,     |                 |
|               |               | and human services. Focusing     |                 |
|               |               | more on the regional economy     |                 |
|               |               | and innovation makes sense on    |                 |
|               |               | many levels for foundations, as  |                 |
|               |               | these are truly the catalytic    |                 |
|               |               | investments which can help the   |                 |
|               |               | region sustain a high level of   |                 |
|               |               | prosperity and vitality.         |                 |
|               |               | Foundations can work to          |                 |
|               |               | support those groups working     |                 |
|               |               | to organize regional initiatives |                 |
|               |               | and policy around a "cluster     |                 |
|               |               | approach."                       |                 |
|               |               |                                  |                 |

- <u>Chicago Innovation Foundation</u> draws on philanthropic donations to fund Innovation Awards, recognizing the businesses and individuals from across the region that are developing breakthrough products and technologies.
- Area foundations are investing in innovation. For example, the MacArthur Foundation
  has made awards to the Chicago Innovation Foundation and Smart Chicago, a civic
  organization devoted to improving lives in in Chicago through technology.

# Rationale for Retain/Revise/Complete/Delete Assessment:

• There have been some progress in this area, but more can be done.

| Action            | Lead            | Specifics                           | Retain/Revise/  |
|-------------------|-----------------|-------------------------------------|-----------------|
|                   | Implementers    |                                     | Complete/Delete |
| Identify          | State (DCEO),   | Review and implement reforms        | Retain          |
| opportunities for | municipalities, | in existing state and local         |                 |
| state and local   | nonprofits      | regulations, especially in areas of |                 |
| regulatory        | (Chicagoland    | rapidly changing technology and     |                 |
| reform and        | Chamber,        | changes in federal regulation.      |                 |
| modernize local   | MEGA, World     | Convene innovative companies        |                 |
| ordinances        | Business        | to learn about potentially limiting |                 |
|                   | Chicago), the   | local regulations or ordinances.    |                 |
|                   | business        | Provide model ordinances that       |                 |
|                   | community       | contain language about up-to-       |                 |
|                   |                 | date regulation and how to keep     |                 |
|                   |                 | it updated. Review validation,      |                 |
|                   |                 | information sharing, and            |                 |
|                   |                 | technical assistance programs for   |                 |
|                   |                 | new technology development          |                 |
|                   |                 | and implementation.                 |                 |
|                   |                 | Recommend updates as                |                 |
|                   |                 | appropriate.                        |                 |

• The <u>Plan for Economic Growth and Jobs</u> by World Business Chicago identifies permitting and regulations as a barrier to business growth. Firms cite costly and time consuming bureaucratic processes and regulations as barriers to innovation and commercialization. For example, the plan describes how manufacturers must interact with numerous city departments as well as their local alderman to address zoning, services, and regulation. The implementation of the plan's 10 strategies is underway and will work to address these regulatory issues.

# Rationale for Retain/Revise/Complete/Delete Assessment:

• Some identification has occurred, though more is needed and the modernization will take time.